

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID M. ARNEY and LINDA S. ARNEY,

Plaintiffs,

CASE NUMBER:
12 CV 7127

-against-

ZIMMER, INC., ZIMMER HOLDINGS, INC.
and ZIMMER ORTHOPAEDIC SURGICAL
PRODUCTS, INC.,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Steven Goodstadt in Support of plaintiffs' Motion to Stay Pending Transfer to Multidistrict Proceeding, executed on October 3, 2012, the exhibits thereto, the Memorandum in Support of Plaintiffs' Motion to Stay Pending Transfer to Multidistrict Proceeding, and all other pleadings and proceedings had herein, the plaintiffs respectfully move this Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, to stay all proceedings, pending a transfer of this action to the Northern District of Illinois as part of multidistrict proceedings styled *In Re: Zimmer NexGen Knee Implant Liability Litigation*, MDL No. 2272 ("MDL-2272).

Dated: October 3, 2012

Respectfully submitted,

A handwritten signature in cursive script, reading "Steven Goodstadt", positioned above a horizontal line.

STEVEN GOODSTADT, Atty. No. SG2386
NAPOLI BERN RIPKA SHKOLNIK
& ASSOCIATES, LLP
350 Fifth Avenue – Suite 7413
New York, New York 10118
Telephone: (212) 267-3700
Facsimile: (212) 587-0031
Sgoodstadt@napolibern.com
Attorneys for Plaintiffs
David M. Arney and Linda S. Arney